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13 Attorneys for Defendant,
14 THE PERMANENTE MEDICAL GROUP, INC.

15 UNITED STATES DISTRICT COURT
16 EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION

17 JULIE AMORUSO,

Case No. 2:20-CV-01335-KJM-DB

18 Plaintiff,

**JOINT STIPULATION AND REQUEST
FOR CONTINUANCE FOR PARTIES TO
COMPLETE ADR AND ORDER**

19 v.
20 THE PERMANENTE MEDICAL GROUP, a
California corporation; and KAISER
21 FOUNDATION HOSPITALS, a California
corporation, collectively dba KAISER
22 PERMANENTE SOUTH SACRAMENTO
MEDICAL CENTER, KAISER PERMANENTE
23 ROSEVILLE MEDICAL CENTER and
KAISER PERMANENTE STOCKTON
24 FACILITY,

Complaint Filed: July 6, 2020
Trial Date: TBD

25 Defendants.

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1 Counsel for Plaintiff JULIE AMORUSO (“Plaintiff”) and Defendant THE
2 PERMANENTE MEDICAL GROUP, INC. (“Defendant”), (collectively referred to as the
3 “Parties”), hereby enter into the following Joint Stipulation and request the Court to extend
4 certain pretrial deadlines, pursuant to applicable Local Rules. These are the only two Parties to
5 this Action.

6 1. This is an Action for alleged violation of Title VII of the Civil Rights Act of 1964
7 and the California Fair Employment and Housing Act, for Failure or Refusal to Hire on Basis of
8 Religion; Failure to Provide Religious Accommodation; and Disparate Impact on the Basis of
9 Religion. The Parties have engaged in extensive written discovery and completed several
10 depositions. After the conclusion of recent depositions, the Parties have agreed to engage in ADR
11 in a good faith effort to resolve this matter. The Parties postponed remaining depositions
12 scheduled for this week and jointly request a stay of the current deadlines. No trial date has been
13 set at this time. Furthermore, one witness remains unavailable for deposition due to an ongoing
14 leave issue. The Parties are meeting and conferring further today and tomorrow to select a
15 mediator and mediation date.

16 2. The Court has previously granted continuances in this matter to allow the Parties
17 to complete discovery. As the Parties now wish to engage in ADR, good cause exists for a
18 further continuance to allow for the ADR process, and to allow the remaining witness to return
19 from leave and appear for deposition if necessary. Because no trial date has been set in this
20 matter, the Parties agree no prejudice will be suffered by the Parties and the Court's docket will
21 not be adversely impacted by granting this request.

22 3. The Parties hereby jointly request the Court to grant the Parties further time to engage in
23 mediation, prior to the completion of discovery, by moving the current deadlines by 120 days.
24 More specifically, the Parties request the following pretrial deadlines to be continued as follows:

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<u>CATEGORY</u>	<u>PRIOR DEADLINE</u>	<u>NEW DEADLINE</u>
Fact Discovery Cut-Off	July 28, 2022	November 25, 2022
Rebuttal Expert Witness Exchange	August 22, 2022	December 20, 2022
Expert Discovery Cut-Off	September 22, 2022	January 20, 2023
Dispositive Motions	October 31, 2022	February 28, 2023

4. The Parties agree to submit a joint report to the Court within 10 business days of
 9 the conclusion of the mediation to apprise the Court of the results and to propose deadlines for
 10 any necessary remaining events.

11 It is so AGREED.

12 Date: July 26, 2022

PACIFIC JUSTICE INSTITUTE

14 By: /s/ Kevin T. Snider (Auth. 07/26/2022)
 15 KEVIN T. SNIDER
 MATTHEW B. MCREYNOLDS

16 Attorneys for Plaintiff
 17 JULIE AMORUSO

18 Date: July 26, 2022

JACKSON LEWIS P.C.

20 By: /s/ Michael J. Christian (Auth. 07/26/2022)
 21 MICHAEL J. CHRISTIAN
 SHANE R. LARSEN

22 Attorneys for Defendant
 23 THE PERMANENTE MEDICAL GROUP,
 INC.

ORDER

2 The Court, having considered the foregoing Joint Stipulation of the Parties, and good
 3 cause appearing therefor, makes the following order:

4 IT IS ORDERED THAT THE PRETRIAL DEADLINES ARE CONTINUED AS
 5 FOLLOWS TO ALLOW THE PARTIES TO ENAGE IN MEDIATION:

<u>CATEGORY</u>	<u>PRIOR DEADLINE</u>	<u>NEW DEADLINE</u>
Fact Discovery Cut-Off	July 28, 2022	November 25, 2022
Rebuttal Expert Witness Exchange	August 22, 2022	December 20, 2022
Expert Discovery Cut-Off	September 22, 2022	January 20, 2022
Dispositive Motions	October 31, 2022	March 10, 2023

12 The Parties are ordered to submit a joint report to the Court within ten business days after
 13 the completion of mediation, updating the Court of the results of the mediation and to propose
 14 deadlines for any necessary remaining events:

15 **IT IS SO ORDERED.**

16 DATED: August 2, 2022.

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 19 CHIEF UNITED STATES DISTRICT JUDGE